

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
RECEIVED  
NORTHERN DIVISION

2005 DEC 29 A 9:45

Richard Wayne Wright, Sr., \*

Plaintiff, Pro Se., \*

- VS -

Sylvester Nettles, et al., \*

Defendants. \*

\* Civil Action No:

\* 2:05-CV-439-A-WO

\*

\*

Plaintiff's Wright Motion For Harmless Error

I Richard Wayne Wright, Sr. Plaintiff Pro-Se., Now Comes to this Honorable Court to ask that it include defendants / parties / person(s) according to rule (19) to be Joined if Feasible, as Following:

(1). Parole Board Members here after referred to as (Par. Bd.M.). These are (the) named people who plaintiff believes took party (but is not Certain because (he) was not able to attend) in being denied Plaintiff Parole and Set(him) off Five (5) years are: Bobby Longshare (Chairman), Sidney Williams, and Nancy McCreary and/or designee(s); "Special Board Members" -- Stephen McGill, Cliff Walker, Don McGriff and Jennifer Garrett. Defendant Segrest (Plaintiff Wright believes knows or Knew) yet (he) did not Signify in his reports "who" these allege (Par. Bd.M.) are or were concerning plaintiff being denied

Parole and Set off Five (5) years on August 16, 2004 which order defendant Segrest handed down, sometimes after the Board decision. IF any of the named defendants, which defendant Segrest should know "who" (they) are from (his) records and Plaintiff earnestly ask this Honorable Court to issue an order upon defendant Segrest to properly identify by names those or these individuals which collectively made up the (Par. Bd. M.) which took part in plaintiff Wright parole hearing, which took place at (such) place on August 16, 2004 among the (Par. Bd. M.) and the Public, ect. Federal Rules of Civil Procedure, Rule (19).

(2). Plaintiff had understood and believed that Mental Health Management [Team] (M.H.M.) <sup>Dr</sup> and Prison Health Service (P.H.S.) and employees were all employed by Alabama Department of Correction (A.D.O.C.) under (P.H.S.) until Plaintiff learn differently after viewing defendant Burks response, through and by (her) Counsel and "Defendants special Report and Answer" which plaintiff receive on or about November 16, 2005 through the (A.D.O.C.) legal Mail system. For such enlightenment bestowed upon plaintiff Wright (he) now ask that (this) Honorable Court

add (M.H.M.) team, not to exclude Dr. William Sanders and M.H.M. as defendants in ~~there~~<sup>R.W.W.</sup> Both ~~their~~ officials and in individual Capacity or through (A.D.O.C.) Official's "whom" this Honorable Court Shall Find acted accordingly to plaintiff Wright Claim(s). Federal Rules of Civil Procedures, Rule # (3), (19) and (20).

(3) Lastly, Plaintiff was assaulted on November 23, 2005 and beating by Sgt. S. Carter (Co. II), Roosevelt Brown (Co. I), Levy Richardson (Co. I) (assisted in placing restraints on plaintiff Wright, Warden Parker (Cos. II) (who were called due to the assault, and a Fourth (4th) Officer not yet identified as a result of (such) attack plaintiff Wright encountered at the hands of the above named defendant's Plaintiff. Plaintiff further ask this Honorable Court to add these defendants named to (his) Complaint as newly design defendant both in ~~their~~ individual Capacity and /or Official Capacity. By this Honorable Court granting such motion will enable plaintiff to further proceed in litigating the Facts to Support (his) Complaint. Plaintiff Wright does not believe by this Honorable Court granting (this) motion, herein, will in any

Way prejudice any party, nor will it in any way unnecessarily delay this adjudication of this matter as prescribed in plaintiff Wright Complaint. IF this motion is not in its proper Form plaintiff Wright ask that it be Construed <sup>R.W.W.</sup> (it) into its proper Form by this Honorable Court. Federal Rules of Civil Procedure, Rule # 61.

Done this the 23rd day of December, 2005.

Respectfully Submitted,

Richard W. Wright, Sr.

Richard Wayne Wright, Sr. # 187140  
Ventress Correctional Facility  
Infirmary Room # 103  
Post Office Box 767  
Clayton, Alabama 36016

Certificate of Service

This is to Certify that I Richard Wayne Wright, Sr., am the plaintiff, Pro-se., in the above encaptioned motion and Certify I have sent this motion to the Clerk of this Court and earnestly ask due to plaintiff indigent status that this Honorable Court and/or

Clerk Forwarded a Copy of this (Said) motion "motion submitted By Plaintiff" (to preserve his rights by adding the newly discovered defendants) to defendant's Counsel(s) which are as Following:

Troy King (Attorney General)  
State Bar# ASB - 5949 - 5615  
Steven Mallette Simon  
(Assistant Attorney General)  
Hugh Davis (Attorney)  
Alabama Board Pardon and Paroles  
Post Office Box 302405  
Montgomery, Alabama 36130

David B. Block (ASB - 5098 - K62D)  
William R. Lunsford (ASB - 4265 - L72L)  
Douglas B. Hargett (ASB - 9928 - S81H)  
Balch & Bingham LLP  
Post Office Box 18668  
Huntsville, Alabama 35804 - 8668

Kim T. Thomas  
Gregory Marion Biggs  
Alabama Department of Correction  
Legal Division  
301 Ripley Street  
Montgomery, Alabama 36130

by placing this motion in the hand

OF the on duty OFFICER in the in-  
firmary unit and (hand deliver) to  
the "Legal mail Box" located in the  
Kitchen to be properly mailed as  
plaintiff has address and proper  
postage to be provided (For mail)  
by the prison official at Ventress  
Correctional Facility on the  
23rd day OF December 2005.

Done this the 23rd day OF  
December, 2005

RespectFully Submitted,

Richard W. Wright, Sr.  
Richard Wayne Wright, Sr. #187140  
Plaintiff, Pro-Se.  
28 USC 1746